

From: Mark Hammaker [mailto:MHamaker@aem-inc.com]

Sent: Tuesday, February 23, 2016 9:23 PM

To: pizarro, luis <pizarro.luis@epa.gov>; Schott, Diane <Schott.Diane@epa.gov>; Cramer, Mike <Cramer.Mike@epa.gov>

Subject: Former Salisbury (Dresser Inc.) Facility, 124 West College Avenue, Salisbury, Maryland

Luis, Diane and Mike -

On behalf of DII Industries, LLC (DII), thank you for taking time on 18 February 2016 to meet with us and representatives of MDE and Dresser, Inc. to review the progress and status of the extensive work that has been completed at the former Salisbury facility (Site). We also very much appreciate the opportunity to have discussed with you our proposed future planned activities at the Site. We thought that the meeting was productive and clarified a number of key items that will help DII continue to make progress on various tasks associated with the corrective action process consistent with EPA's 2020 RCRA corrective action goals.

Following our meeting, Diane contacted me on several occasions to clarify, and in some instances apparently to alter, the positions that EPA articulated during our meeting. To assist in ensuring that DII's planned activities at the Site proceed smoothly in light of the timing concerns we discussed relating to completing the update to the Environmental Indicator for Migration of Contaminated Groundwater Under Control (GWEI) by 30 September 2016, we are confirming DII's understanding of the key points of consensus that were reached during the meeting and subsequent telephone conversations:

- Starting on 7 March 2016, DII plans to proceed with the installation of 25 new groundwater monitoring wells at the Site as described in the Site-Wide Groundwater Characterization Summary Report submitted to EPA on 30 November 2015. EPA stated that it had not yet completed its review of the proposed number and locations of the additional groundwater monitoring wells, and that EPA will notify DII as soon as possible if EPA believes that DII should not proceed with the planned monitoring well installation activities.
- In April 2016, DII plans to conduct a synoptic groundwater monitoring event including all 36 existing monitoring wells and the 25 newly-installed monitoring wells at the Site.
- Following receipt and evaluation of the results from the April 2016 groundwater monitoring event, DII anticipates meeting with EPA again to discuss further steps to complete the update to the GWEI by 30 September 2016. DII anticipates that the update to the GWEI will include the results of groundwater modeling in conjunction with onsite groundwater monitoring data. EPA agreed that such an approach is appropriate and, depending upon the modeling results, may be sufficient to complete the update to the GWEI without the need to conduct groundwater sampling in the area downgradient of the Site.
- Resolution of the universe of parcels subject to the corrective action process is underway. While there is consensus that the main plant parcel is subject to the corrective action process, there are differences of view as to status of the other three parcels that have been identified for potential inclusion in the corrective action process. If the parcel to the north of the main plant parcel across West College Avenue is determined to be subject to the corrective action process, EPA confirmed that the Phase I and Phase II

reports that were prepared at the time the parcel was transferred to a third party in 1997 are adequate for purposes of satisfying the corrective action process. The east parking lot and south parking lot were both acquired in 1997 after interim status for the Site had terminated. DII believes that the acquisition date of these two parcels necessarily means that they are not subject to interim status corrective action requirements. EPA is considering these issues further.

- EPA acknowledged that the activity and use limitations (AULs) for the Site that Dresser and the Foundation have agreed to are consistent with non-residential use scenarios. There is consensus that these AULs will be incorporated into an environmental covenant (EC) consistent with the Maryland Uniform Environmental Covenants Act that will include both EPA and MDE as parties. DII anticipates circulating a proposed EC to EPA and MDE for consideration as soon as DII, Dresser and the Foundation have completed their review of the current draft of the EC. The EC is expected to be finalized and recorded in advance of the selection of final corrective measures for the Site.
- EPA agreed that the AULs may be incorporated into the risk assessment process as part of defining the reasonable expected future use of the Site. As a result, there would be no need for a baseline risk assessment that considers residential exposure scenarios. As requested by EPA, DII will confirm that local zoning requirements are consistent with anticipated future land use as described in the EC.
- DII will remove three of the tarps that currently are present at the Site - one over the former CPP, one over the east side UST area, and one over the wet test stand area – in advance of installation of the new monitoring wells.
- EPA agreed that DII can discontinue routine gauging of LNAPL at the Site, with the understanding that periodic monitoring for LNAPL will be conducted as part of planned site-wide groundwater monitoring events, and that any measurable LNAPL that is encountered during gauging activities as part of such groundwater monitoring events will be removed and disposed of appropriately.
- DII understands that EPA is continuing its review of the Chromium Report and therefore the parties expect to discuss in the future DII's approach for using monitored natural attenuation to address Cr(VI) that remains in groundwater in the area of the former CPP.

In addition to the foregoing, we have sent oversize figures showing the locations of the new monitoring wells that DII plans to install to EPA via overnight delivery. These figures are in response to the request that EPA made at the meeting. We are also setting up an FTP site where all of the presentation materials used during the meeting can be downloaded. I will send you separately the information for accessing the FTP site as soon as it is available.

We look forward to proceeding as described above.

Best regards,
Mark

Mark K. Hammaker, P.E., Principal
APPLIED ENVIRONMENTAL MANAGEMENT INC.
Environmental Engineering & Project Management

181 Bridge Street, Phoenixville, PA 19460-3401
(t) 610-251-0450 | (m) 267-319-2258 | www.aem-inc.com

ATTENTION: This email and any attachments hereto are intended only for the designated addressee(s) and may be confidential, proprietary, privileged or otherwise protected by law from disclosure or use by a third party. If you are not the intended recipient, please delete this message and its attachments, and destroy any hard copies you may have created. Thank you.